

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Kewaunee School District

Agency Code: 31-2814

School(s) Reviewed: Kewaunee Elementary School

Review Date(s): 3/7/17 - 3/8/17

Date of Exit Conference: 3/8/17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Kewaunee School District for the courtesies extended during the on-site review. Thank you to the Food Service Director, Determining Official, Business Director, and Food Service Staff for being available when answering questions and providing additional information when necessary. Administrative and Food Service staff were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests,

as well as pulling records for the on-site portion of the review. It has been a pleasure working with you all this week.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

1. The January breakfast claim was validated and consolidated correctly.
2. The January Special Milk Program claim was consolidated correctly.
3. Direct Certification (DC) has been run the required amount of times for the school year. The Determining Official does a great job running Direct Certification multiple times throughout the school year.
4. The correct letter templates regarding Free and Reduced Meal Applications, Verification, and Direct Certification were used.
5. Verification was done completely and well documented. It was completed before the November 15 deadline. The Verification Collection Report was submitted before the February 1 deadline.

Technical Assistance and Program Requirement Reminders

1. Be sure to record the correct eligibility start date into Infinite Campus, which is the date DC is run.
2. Remember to run the Edit Check report for all schools when completing the lunch and breakfast claims.

Findings and Corrective Action Needed

☐ **Finding #1:** The incorrect report was being used to consolidate the monthly claims for reimbursement.

- **Corrective Action Needed:** Begin using the Edit Check report through Infinite Campus for each site that participates in NSLP and SBP. Scan and email copies of the February Edit Check reports for lunch only.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and school nutrition professionals of Kewaunee Grade School. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service Director is competent and resilient. Through much turn over this school year, she continues to make improvements to the school nutrition programs at Kewaunee Grade School. Many of her questions sought feedback or suggestions for best practices from other school districts. The Director was also highly responsive and accommodating. The serving line was colorful, clean, and welcoming. Fruits and vegetables from the garden bar were popular with students, and many students appreciated a choice of entrée.

Technical Assistance and Program Requirement Reminders

Standardized Recipes

Use of standardized recipes is an important part of the national nutrition programs. Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Technical assistance was given on the chef salad, creamy broccoli soup, and loaded turkey sub recipes served during the review week. Continue to use the resources on the DPI website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

Whole Grain-Rich

In order to be whole grain-rich, a grain food must list a whole grain as its first ingredient. Any other grain ingredients in the product must be enriched, if not whole grain. Or, documentation must be available in the form of a product formulation statement (PFS) to show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients. USDA has a very thorough Whole Grain Resource that provides tools and tips for identifying whole grain-rich products: <http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>.

Unlike Frosted Flakes Multigrain for Schools, Apple Jacks are not the “for Schools” variety. The ingredient statement lists sugar as the first ingredient. Therefore, a product formulation statement is required to demonstrate the whole grain content, which must exceed sugar content by weight.

Production Records

The production record template includes the required information; however, all sections must be filled in completely each day. Meals Planned, Planned Serving Size, Planned # of Servings, Actual # of Servings Prepared, and Total Quantity Prepared were frequently left blank on lunch production records. Daily production records show portion sizes of meal components were appropriately planned and served. Please continue to work with all staff members to record planned usage, actual usage, and leftovers.

Be specific about the identity, brand, and description of the items served. Instead of “cereal bar” or “muffins”, list the specific type. Those descriptions may be listed on menus for flexibility and to save space, but they are not detailed enough for production records. When two or more menu items are offered together, such as yogurt and a grain (e.g. dinner roll, bun, breadstick) or PB&J and a string cheese, ensure both items are on the production record. You may list them on one line, like “PB&J with string cheese”, or separately, like “yogurt” and “dinner roll.” Ensure staff understand the combination(s) and offer components to students in planned amounts.

Additionally, substitutions made for students with special dietary needs must be recorded. You may choose to write this information on the same or on a separate production record. You must keep dietary request forms on file as supporting documentation.

Vegetable Subgroups

Each vegetable subgroup has a specific minimum weekly requirement. These requirements are outlined on the Lunch Meal Pattern Table, located at the following address:

<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf>. During the week of review, the beans/peas vegetable subgroup minimum weekly requirement was not met. Consider serving baked beans or refried beans from the steamtable or garbanzo beans or black beans from the garden bar. Green beans, green peas, and lima beans do not credit toward the beans/peas subgroup.

Crediting Documentation

Processed products require a current Child Nutrition (CN) label or a detailed product formulation statement (PFS) to be credited toward the meal pattern. A complete PFS must be directly from the manufacturer and must include the product name and number, weights of raw and cooked ingredients, portion size, statement of contribution to meal pattern requirements, and an original signature from the manufacturer certifying that the information is correct. It is highly preferred that this documentation is printed on company letterhead, and signed by an appropriate person (e.g. a quality assurance agent or registered dietitian, rather than a salesperson.) If a processed item does not have a valid CN label or PFS, it may not be credited when served as part of the USDA's Child Nutrition Programs. Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

State-Processed Products and USDA Brown-Box Foods have fact sheets, detailing meal pattern contributions. The fact sheets are updated annually. USDA Brown-Box Foods fact sheets can be found here: <http://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>. State-Processed Products fact sheets can be found here: http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed_nutritioninfo_1617.pdf.

Remember to collect new product labels annually. Update records when new products are purchased and when product formulations change throughout the school year. More information regarding crediting documentation can be found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>.

Smart Snacks

The timer on a vending machine selling noncompliant beverages must be adjusted such that the machine is accessible thirty minutes after the end of the school day. Noncompliant beverages include flavored water at the elementary and middle school levels. The Food Service Director contacted the individual who manages the machine. No further action is required.

Buy American

Three non-domestic products were identified – canned pineapple from Thailand, frozen oriental vegetables from Mexico, and blended canola and olive oil from USA, Italy, Spain, Greece, Tunisia, Morocco, and Turkey. Non-domestic products must be documented, including the reason for exception to the Buy American provision.

Findings and Corrective Action Needed

Meal Pattern Finding #1: Weekly minimum requirement for the meat/meat alternate component is not being met as a result of 1.50 ounce equivalent meat/meat alternate menu items (e.g. yogurt) offered five times during the week of review. While a six ounce portion of yogurt meets daily

minimum requirements, a student who selects yogurt every day only has access to 7.50 ounce equivalents of meat/meat alternate per week, 1.50 ounce equivalents short minimum weekly requirements for the K-8 meal pattern.

Corrective Action: Please submit a statement describing how you will alter the menu to meet the requirements going forward.

Meal Pattern Finding #2: Vegetable subgroup minimum weekly requirements were not met, with a 1/2 cup shortage in the beans and peas (legumes) subgroup.

Required Corrective Action: Please submit a statement describing how you will meet the vegetable subgroup requirements going forward.

Meal Pattern Finding #3: Insufficient crediting documentation for baked chicken (Tyson Fully Cooked, Coated 8 Piece Cut Chicken, 18146-820) and Apple Jacks cereal.

Required Corrective Action: Please contact Tyson and Kellogg's to obtain product formulation statements (PFS) or child nutrition (CN) labels for these two items, then submit. A photocopy of a label for Apple Jacks for School is also acceptable. If proper documentation cannot be obtained, discontinue using these products for school meals and submit crediting documentation for replacement products.

3. RESOURCE MANAGEMENT

Commendations

The 16-17 Paid Lunch Equity Tool was well done. The 17-18 PLE tool was sent to the SFA to use.

Comments/Technical Assistance/Compliance Reminders

1. The Resource Management Risk Assessment Tool was completed with 1 flag. A comprehensive review of non-program foods was required.
2. USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. Work on creating and implementing a policy.

For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a "Nutshell": <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>.

For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

Findings and Corrective Action Needed

❑ **Finding #1:** The Annual Financial Reports for the past few years were submitted incorrectly.

Corrective Action Needed: Update the numbers for the 14-15 SY and 15-16 SY. Submit new numbers to the Nutrition Program Consultant which will be relayed to the School Nutrition Team Accountant. Watch the webinar on the new Annual Financial Report:

<https://media.dpi.wi.gov/school-nutrition/annual-food-service-financial-report/story.html> Complete the quiz at the end of the webinar. Send a copy of the downloadable certificate to show completion of this task.

4. GENERAL PROGRAM COMPLIANCE

Commendations

1. The Food Safety plan was well done and had all of the required components.
2. The first Food Safety Inspection was completed in November for the reviewed site and the second inspection was in January.
3. On-site monitoring forms for lunch and breakfast at each site were completed by February 1 and well documented.
4. Food Service Director does a great job making sure each staff member receives proper OVS training, as well as Civil Rights, Food Safety, and other required trainings at the beginning of the school year to meet Professional Standards requirements.

Comments/Technical Assistance/Compliance Reminders

1. Consider using the [DPI tracking tool](#) to track Professional Standards training hours for staff.
 - SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff) name of training, and where the training was taken from (i.e. USDA webinar, DPI SNSDC course, etc.). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

Findings and Corrective Action Needed

❑ **Finding #1:** An incorrect version of the full USDA non-discrimination statement is printed on the approval/denial of benefit notification letters.

Corrective Action Needed: Update the letter template used on Infinite Campus to have the current, full and correctly formatted non-discrimination statement. Scan and email a copy of this new letter.

❑ **Finding #2:** Overt Identification was occurring on the point of sale system with colored circles indicating which students were free, reduced, and paid.

Corrective Action Needed: Remove the colored circles from being seen on the point of sale system. This was corrected on-site. No further action required.

5. OTHER FEDERAL PROGRAMS REVIEWS

Comments/Technical Assistance/Compliance Reminders

1. The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

The Wellness Policy should be updated to include:

- a. Specific measurable goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- b. Nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- c. At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process.
- d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies on school website, social media, newspaper, or newsletters.
- e. Document public involvement, public updates, policy leadership, and evaluation plan.
- f. SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy.
- g. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. Some methods of notification include mailing flyers, newsletters, emails, website postings, and newspaper articles.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

2. This is a reminder that the regulations require that the SFA inform eligible families before the end of the school year of availability and location(s) of any Summer Food Service Programs located in the geographic area of the SFA. This can be posted on a bulletin board or in the halls of the schools as well as a newsletter or school website. Information on this can be found on our website at <http://dpi.wi.gov/community-nutrition/sfsp>. There is a link at the bottom of

the page that shows a map of all the places in the area offering the Summer Food Service Program. Families can also call 211 to get accurate dates and time of locations operating the Summer Food Service Program.

Findings and Corrective Action Needed

❑ **Finding #1:** Pre-Kindergarten students participating in the Special Milk Program were also participating in the National School Lunch Program which is unallowable since the Special Milk Program is for students that do not have access to the National School Lunch Program or School Breakfast Program.

Corrective Action Needed: Discontinue claiming these students within the Special Milk Program. Do not claim them under the Special Milk Program for February. Submit the total number of unallowable milks (free and paid counts by month) for September – January for these students. The cost of the milk from February will have to be charged to the households of these students or non-federal funds can cover the cost. The cost cannot be absorbed by Fund 50.

❑ **Finding #2:** Overt Identification was occurring on the point of sale system with colored circles indicating which students were free, reduced, and paid.

Corrective Action Needed: Remove the colored circles from being seen on the point of sale system. This was corrected on-site. No further action required.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

